

Edmund J. Gorman, Jr.  
Attorney at Law, Ltd.  
State Bar No. 11581  
335 W. First St.  
Reno, NV 89503  
(775) 622-3274  
[ejgormanjr@ejgormanlaw.com](mailto:ejgormanjr@ejgormanlaw.com)  
Attorney for Defendant Tom Vredevoogd, Trustee  
Of the Kimberly J. Vredevoogd Trust

**IN THE UNITED STATE DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

CHINA ENERGY CORPORATION, a Nevada )  
corporation, )

3:13-CV-00562-MMD-VPC

Plaintiff, )

v. )

ALAN T. HILL, ELENA SAMMONS, )  
MICHAEL SAMMONS, THOMAS S. )  
VREDEVOORG, TRUSTEE OF THE )  
KIMBERLY J. VREDEVOOGD TRUST UA )  
10/7/2008, JUN HE, and RANDY DOCK )  
FLOYD, )

**MOTION TO SUBSTITUTE COUNSEL**

Defendants. )

COMES NOW Defendant Thomas S. Vredevoogd, Trustee of the Kimberly J. Vredevoogd Trust U/A/  
10/7/2008, by and through counsel, Edmund J. Gorman Jr., of Edmund J. Gorman Jr., Attorney at Law,  
Ltd, and moves the Court substitute Edmund J. Gorman Jr., Attorney at Law Ltd. for Holland & Hart,  
LLP as counsel of record for the Defendant in this case. Pursuant to LR 10-6(c), Defendant shows the  
following:

I, Thomas S. Vredevoogd, Trustee of the Kimberly J. Vredevoogd Trust, consent to the  
substitution of Edmund J. Gorman Jr., Attorney at Law, Ltd., as my counsel and attorney of record in  
place of Holland & Hart LLP, and Tamara Reid, Esq.

1   
2 Thomas S. Vredevoogd  
3  
4

5 2. I, Tamara Reid, consent to the substitution of Edmund J. Gorman Jr., Attorney at Law, Ltd., as  
6 counsel and attorney of record for Thomas S. Vredevoogd, Trustee of the Kimberly J. Vredevoogd Trust.  
7

8   
9 Tamara Reid  
10

11 3. I, Edmund J. Gorman Jr., consent to the substitution of Edmund J. Gorman Jr., Attorney at  
12 Law, Ltd., as counsel and attorney of record for Thomas S. Vredevoogd, Trustee of the Kimberly J.  
13 Vredevoogd Trust, in place of Holland & Hart LLP.  
14

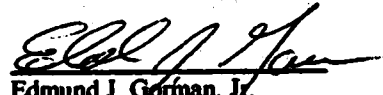
15   
16 Edmund J. Gorman, Jr.  
17

18 WHEREFORE, Defendant prays the Court enter an Order:  
19

20 1. Granting leave to substitute Edmund J. Gorman Jr., Attorney at Law, Ltd., in place of Holland  
21 & Hart, LLP as attorney of record for Thomas S. Vredevoogd, Trustee of the Kimberly J. Vredevoogd  
22 Trust, u/a/d 10/7/2008; and  
23

24 2. For such other or additional relief as the Court deems just and proper.

25 Dated this 28<sup>th</sup> Day of March, 2016  
26

27   
28 Edmund J. Gorman, Jr.  
Attorney at Law, Ltd.  
335 W. First St.  
Reno, NV 89503

**Proof of Service**

Thomas S. Vredevoogd, by and through counsel, Edmund J. Gorman Jr., Attorney at Law, Ltd., has served to the interested persons listed below a true copy of the Motion to Substitute Counsel, by service through CM/ECF to:

Richard L. Elmore, Esq.  
Tamara Reid, Esq.  
Holland & Hart  
5441 Kietzke Lane, 2nd Floor  
Reno, NV 89511

Michael Sammons  
15706 Seekers St  
San Antonio, TX 78255  
*Defendant in Proper Person*

Edmund J. Gorman Jr.  
335 W. First St.  
Reno, NV 89503  
*For Alan T. Hill*

And via US Mail, postage prepaid, and placed for mailing March 28<sup>th</sup>, 2016 to the following:

Elena Sammons  
15706 Seekers St  
San Antonio, TX 78255  
*Defendant in Proper Person*

Randy Dock Floyd  
4000 Goff Road  
Aynor, SC 29551  
*Defendant in Proper Person*

Jun He  
231 Split Rock Rd  
The Woodlands, TX 77381  
*Defendant in Proper Person*

China Energy Corporation  
c/o United Corporation Services, Inc.  
2520 ST ROSE PKWY STE 319  
Henderson, NV 89074

I declare under penalty of perjury under the laws of the State of Nevada and the United States of America that the foregoing is true and correct.

Dated this 28<sup>th</sup> Day of March, 2016.

/s/ Edmund J. Gorman, Jr.  
Edmund J. Gorman, Jr.  
Attorney at Law, Ltd.  
335 W. First St.  
Reno, NV 89503

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Attorney at Law, Ltd.  
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Attorney for Defendant Tom Vredevoogd, Trustee  
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10/7/2008, JUN HE, and RANDY DOCK )  
FLOYD, )

ORDER GRANTING SUBSTITUTION OF  
COUNSEL

Defendants. )

IT IS HEREBY ORDERED that Edmund J. Gorman Jr., of Edmund J. Gorman Jr., Attorney at Law, Ltd.,  
is substituted in place and stead of Holland & Hart, LLP as attorney of record for Thomas S.  
Vredevoogd, Trustee of the Kimberly J. Vredevoogd Trust U/A/ 10/7/2008;

IT IS FURTHER ORDERED that Holland & Hart LLP, Tamara Reid, Esq., and Richard L. Elmore, Esq.  
shall be removed from the Court's electronic service matrix in this case.

Dated this 1st Day of April, 2016.

  
United States Magistrate Judge